

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0111**

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEES CHANGES, 2001

Docket No. R2001-1

**THIRD INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
TO UNITED STATES POSTAL SERVICE
WITNESS JENNIFER L. EGGLESTON (USPS-T25)**

The Parcel Shippers Association (PSA) requests United States Postal Service to respond fully and completely to the following interrogatories and requests for production of documents pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure.

Respectfully submitted,



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Counsel for Parcel Shippers Association

Dated: December 5, 2001

PSA/USPS-T25-6. Please refer to your response to PSA/USPS-T25-1 (a) &(b) where you discuss why you distributed intra-bulk mail-center (BMC) and inter-sectional center facility (SCF) transportation costs entirely to the intermediate transportation category.


- (a) Please confirm that intermediate transportation (as used in USPS-LR-J-64) refers primarily to transportation between BMCs and SCFs within their service territories. If not confirmed, please explain fully.

- (b) Please confirm that long-distance transportation (as used in USPS-LR-J-64) refers primarily to transportation between two BMCs. If not confirmed, please explain fully.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served (6) copies of the foregoing document upon the United States Postal Service by hand and by First Class Mail upon all participants in this proceeding requesting such service.

Dated: December 5, 2001



Timothy J. May